

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

ASHLEY ALBERT, et al.,

Plaintiffs,

v.

GLOBAL TEL*LINK CORP., et al.,

Defendants.

Civil Action No. 8:20-CV-1936

MOTION TO SEAL LICENSE AGREEMENT

Pursuant to Federal Rule of Civil Procedure 5(d) and Local Rule 105.11,¹ Defendants Securus Technologies, LLC, Global Tel*Link Corp., and 3Cinteractive Corp., through counsel, jointly move to file a confidential exhibit to their Memorandum in Support of their Motion to Dismiss under seal—the License Agreement by and between Securus Technologies, LLC and 3Cinteractive Corp., attached as Exhibit A to their Memorandum. The License Agreement contains information that is proprietary and highly confidential, and specifically contains sensitive information that the contracting parties would not share with a competitor.

A standard-form confidentiality order has not yet been entered, but all parties have agreed to negotiate and submit for the Court’s approval a form of two-tier stipulated protective order governing the designation of confidential and highly confidential documents. Defendants anticipate that the License Agreement would be designated “highly confidential” under such an order, and all parties are conditionally honoring that designation. On October 29, 2020, counsel

¹ With respect to this Court’s Letter Order Regarding the Filing of Motions, ECF No. 3 (“Letter Order”), Defendants submit that this Motion to Seal License Agreement is neither a substantive motion nor a discovery motion, and thus may be filed pursuant this Court’s local rules without first serving and filing a pre-motion letter as provided in the Letter Order.

for Plaintiffs indicated that they take no position with respect to the relief requested herein, and reserve all rights.

WHEREFORE, for the foregoing reasons, and for good cause shown, Defendants request that the Court grant their motion to file under seal the above-referenced exhibit to their Motion to Dismiss, accept the License Agreement under seal, and any other and further relief as deemed just and proper.

Dated: October 30, 2020

Respectfully submitted,

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